



**WORK PLAN  
FOR THE  
REMOVAL AND DISPOSAL  
OF WASTE MATERIAL**

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**Former Vitco Facility  
900 East Wabash Ave  
Nappanee, IN 46550**

**By**

**Heritage Environmental Services, LLC  
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**June 10, 2008**

## **1.0 INTRODUCTION**

This work plan covers the methods, the order of work, and the scope of work which will be conducted by Heritage Environmental Services at Vitco. The site is located at 900 E. Wabash Ave, Nappanee, IN 46550. This work plan is based on site visits. A listing of personnel from Heritage Environmental Services and copies of the employee's training shall be provided upon request.

## **2.0 SCOPE OF WORK**

- 2.1 Heritage Environmental Services will supply the labor, materials, equipment and supplies to conduct the following scope of work.
  - 2.1.1 Reapply for the EPA ID number IND005081799 (currently listed as no longer a generator). New owner must apply with correct info.
  - 2.1.2 The waste has been sampled and analysis is being performed for waste characterization and to establish waste stream profile/treatment options.
  - 2.1.3 Preliminary lab pack inventory has been completed.
  - 2.1.4 The bulk wastes (acids & caustics) will be loaded on permitted tankers for transport to the TSD (Heritage Treatment Center in Indianapolis, IN).
  - 2.1.5 Any existing drummed waste will be inspected to verify the drums are acceptable for transport.
  - 2.1.6 Any damaged drums will be repackaged or over-packed for transport.
  - 2.1.7 Cleaning or rinsing of tanks, containers to be determined.
  - 2.1.8 Decon of the storage area, pits, sumps, floors & containment to be determined.

## **3.0 WORK PLAN**

- 3.1 Pre Work Inventory

The chemical inventory and preliminary lab pack inventory have been completed by Heritage.
- 3.2 Site Specific Sampling Plan

To be completed upon execution of the contract.
- 3.3 Staging of Materials

Heritage will establish a designated area for waste storage (lab pack waste). This will be short term until the packing is complete and the waste is transported for disposal. The waste will be transported as soon as it is packed or loaded.
- 3.4 Material Packaging & Handling
  - 3.4.1 Bulk waste will be loaded and shipped according to the established waste profiles.
  - 3.4.2 Drums and Containers (If Applicable)
  - 3.4.3 Petroleum Products and Oils (If Applicable)
  - 3.4.4 Residual Process Waste (If Applicable)
    - 3.4.4.1 Sludges and Dirt (If Applicable)
      - 3.4.4.1.1 Sludges and contaminated dirt shall be containerized in the appropriate containers which may include drums, roll-off boxes and cubic yard boxes for transportation and disposal.
    - 3.4.4.2 Containers of Miscellaneous Materials

- 3.4.4.2.1 Greater Than 5-gallon containers shall be bulked up with similar materials as described in section 3.4.1.
    - 3.4.4.2.2 5-gallon containers or less shall be managed as a lab pack and similar materials will be over packed together.
  - 3.4.4.3 Caustic Soda, Sodium Hydroxide, and Acids.
    - 3.4.4.3.1 Caustic soda, sodium hydroxide and acids will be managed as bulk waste and transferred to haz waste permitted tankers for immediate transport to the TSD.
  - 3.4.4.4 Miscellaneous Materials NOT in Containers.
    - 3.4.4.4.1 Miscellaneous Laboratory Chemicals.
      - 3.4.4.4.1.1 Any miscellaneous laboratory chemicals will be containerized in DOT approved containers and segregated based on the chemical's DOT categories, labeled and transported to the staging area prior to proper disposal.
- 3.5 Transportation of Materials
  - 3.5.1 All materials being transported as hazardous material will be transported in permitted trucks by drivers with a HazMat endorsement.
- 3.6 Disposal of Materials.
  - 3.6.1 The material listed in the above scope of work will be disposed at approved facilities selected from the following list for the services listed. Individual facilities will be based on EPA waste codes and approvals.
  - 3.6.2 Heritage operates a permitted hazardous waste TSD in Indianapolis, IN and a permitted incinerator in East Liverpool, OH.
- 3.8 Water Control
  - 3.8.1 The work will occur inside of the building and be protected from any rainwater. Any rain water that leaks through the roof during the project will be pumped into DOT approved containers to be sent off site for disposal.
- 3.9 Recordkeeping
  - 3.9.1 All appropriate hazardous manifests, non-hazardous manifests, bills of lading, and other pertinent paperwork will be retained and copies submitted to all appropriate parties. An authorized representative from the generating facility will need to be available to sign all manifests prior to transportation of the material.
- 3.10 Bulk Hazardous Material Container Cleaning.
  - 3.10.1 Acid/Base Containers

Tanks and bulk containers(totes) which have been drained of acids or bases, will be tripled rinsed and the rinseate containerized and disposed of with the original container contents. Final rinseate will be tested with pH strips. Additional rinses will be conducted until the pH strips indicate neutral rinseate.
  - 3.10.2 PCB Containing Oil Transformers (If Applicable).

After draining the transformers, the transformer will be triple rinsed and wipe sampled for analysis for PCBs for verification of clean.
  - 3.10.3 Other Hazardous Material Bulk Storage Containers.

All other bulk storage/tanks will be triple rinsed and wipe sampled for the appropriate analytical parameters for verification of clean.

#### **4.0 SAFETY**

- 4.1 Heritage Environmental Services will create and adhere to the Heritage Site Specific Health and Safety Plan. Copies of Heritage Environmental Services personnel's current 8-hour HAZWOPER Refresher Training Certificates, Site Health and Safety Plan and all other requested training documentation shall be provided upon request.
- 4.2 Spill Management
  - 4.2.1 During the site activities, care will be taken to minimize any spillage or release of the materials being handled. Spill kits will be in easily accessible locations on the levels where the work is being conducted.
  - 4.2.2 In the event of a hazardous material release greater than the regulatory threshold or a release less than the regulatory threshold which poses a significant hazard due to the location of the spill, the release will be managed as a HAZMAT incident. All personnel working in the immediate and adjacent areas of the release that could be reasonably impacted by the hazard shall be evacuated to a safe location until the release has been mitigated and the area determined safe for routine work to resume.
- 4.3 Evacuation Plan
  - 4.3.1 A suitable evacuation route and congregation area shall be determined in the site meetings addressing each specific work area prior to commencement of work in the area. This will be included in the HASP.
  - 4.3.2 The evacuation plan for the specific area shall be reviewed with all workers scheduled to work in the area prior to the worker entering the area.
  - 4.3.3 No worker shall be permitted to enter the work area until trained in the evacuation plan for the area.
  - 4.3.4 Visitors (a non-scheduled worker, inspectors, auditors, etc.) that have been granted access to the work area must be escorted by a supervisor that has been trained in the evacuation plan for the area being accessed.
- 4.4 Personal Protective Equipment (PPE)
  - 4.4.1 All Heritage Environmental Services personnel will be equipped with the appropriate personal protective equipment (PPE). The appropriate PPE will be determined by the Site Health and Safety Officer based on monitoring, type of material being handled, risk of dermal contact, inhalation, or ingestion, and site conditions.
  - 4.4.2 Address site specific PPE
- 4.5 Air Monitoring
  - 4.5.1 For each work zone, prior to the commencement of work in the area, background air monitoring shall be performed to ensure the area is safe for work activities. All air monitoring results shall be documented and kept on file for review.
    - 4.5.1.1 Air monitoring at a minimum shall consist of Oxygen and LEL.
    - 4.5.1.2 Specific air monitoring shall be conducted where there are known hazardous chemicals that are not containerized and can pose an airborne hazard as identified on the material safety data sheet

(MSDS) for the material. An example of this air monitoring activity would be monitoring for LEL when bulking or transferring flammable materials.

4.5.1.3 Where respiratory protection is required, continuous air monitoring will be done for oxygen levels to ensure that the minimum oxygen levels are maintained as directed by OSHA's regulatory standards for respiratory protection.

4.5.1.4 For containerized chemicals, (which also include sealed mercury containing devices), oils and other chemicals which pose no immediate airborne hazards based on the MSDS for those chemicals, no specific air monitoring shall be performed with the exception of sections 4.5.1 - 4.5.1.1.

4.5.1.5 Air Monitoring shall be conducted for all spills which warrant an emergency response or otherwise constitute a HAZMAT incident in accordance with section 4.2.2.

4.5.1.5.1 Air monitoring in this situation shall be consistent with the type of material and hazards associated with the released material. Specific air monitoring requirements shall be determined from technical data and MSDS sheets.

#### 4.6 Decontamination Procedures

4.6.1 All Decontamination shall be performed in accordance with the Contractor's specified decontamination plan which will be generated after the waste determination has been completed.

4.6.2 A decontamination area shall be determined for each specific work zone. These areas shall be determined during the daily or weekly meetings when the exclusion zones are determined for the area.

##### 4.6.3 Decontamination for Containerized Materials and Oils

4.6.3.1 Personnel decontamination will consist of removal of all PPE.

Discarded PPE will be containerized in drums for disposal at a non-hazardous waste facility. All hand tools, hoses, etc., used for bulking of materials will be decontaminated using detergent, rinsed, and allowed to air dry. All decontamination fluid generated will be containerized in DOT approved drums and disposed of as hazardous waste.

#### 4.7 Exclusion Zones / Work Zones

4.7.1 Drum removal, bulking of materials, lab packing activities.

4.7.1.1 Because of the locations of the materials, the exclusion/work zones for each area shall be determined during the daily and/or weekly site meetings.

4.7.1.2 All exclusion zones shall be identified with one or more of the following:

4.7.1.2.1 Barrier Tape and/or barricades

4.7.1.3 The staging area will be considered an exclusion zone and will be marked with safety tape. No personnel without the appropriate PPE will be allowed in the staging area.

#### 4.8 Lockout/Tagout

- 4.8.1 Heritage will lock out and tag out any electric devices, pumps, valves, mixers and other items as necessary to complete the work safely.

## **5.0 INSURANCE**

- 5.1 During the site activities including the transportation and disposal of the materials, Heritage Environmental Services will maintain adequate insurance. Heritage will provide a insurance certificate upon award of the contract.